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SPECIAL COUNSEL TO THE TRUSTEE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

<p>IN RE:</p> <p>MCCLAIN FEED YARD, INC., MCCLAIN FARMS, INC., AND 7M CATTLE FEEDERS, INC.,</p> <p><i>Debtors.</i>¹</p>	<p>Chapter 7</p> <p>CASE NO. 23-20084-rlj</p> <p>Jointly Administered</p>
<p>KENT RIES, CHAPTER 7 TRUSTEE FOR THE BANKRUPTCY ESTATES OF MCCLAIN FEED YARD, INC., MCCLAIN FARMS, INC., AND 7M CATTLE FEEDERS, INC.,</p> <p><i>Plaintiff,</i></p> <p>v.</p> <p>ANGELA ROBINSON, et al.,</p> <p><i>Defendants.</i>²</p>	<p>ADV. PROC. NO. 25-02003-rlj</p> <p>Honorable Robert L. Jones</p>

¹ The Debtors in these chapter 7 cases are: McClain Feed Yard, Inc. (Case No. 23-20084-RLJ), McClain Farms, Inc. (Case No. 23-20085-RLJ), and 7M Cattle Feeders, Inc. (Case No. 23-20086-RLJ).

² The Defendants named in the Complaint are Angela Robinson, Terry Robinson, Rebecca Robinson, 2B Farms, Arnold Braun, Arnold Braun Trust, Robert Bruan, C Heart Ranch LLC, Colette Lesh f/k/a Colette Brooks, Jan Lesh, Gary Lesh, Jared Lesh, Lesh Trucking, Joel Lesh, Lazy J Arena, Morrison Café, Gary Lesh Trust, Lesh Family Trust, Katie Lesh, Jordan Lesh, Jared Lesh Cowhorses, Inc., Gray Brothers Cattle, Gray Family Trust, Ronnie Gray, Robert Gray, Bradley Gungoll, Gungoll Cattle LLC, Wade Gungoll, William Gungoll, Cory Jesko, Jeff Jesko, Dwight Jesko, Patricia Jesko, Daniel Jesko, Daniel Jesco Farms, Don Jones Trucking, Curt Jones, Kinsey Jones, Curtis Jones Farms, Don Jones Farm, Inc., Don Jones, Jones Family Cattle, Ridgefield Capital, Robert Ellis, Elizabeth Ellis, Robert and Elizabeth Family Foundation, TGF Ranch, Thomas Frith, Wildforest Cattle Co., Sam Brown, Colby Vanbuskirk, Lyndal Vanbuskirk, Janet Vanbuskirk, Frank Vanbuskirk, Susan Vanbuskirk, Sam Vanbuskirk, Charles Lockwood, Nikki Lockwood, Cole Lockwood, Sherle Lockwood, Priest Victory Investments, Priest Cattle, Corey Priest, Tyler Pittman, Pittman Farms, DAC83 LLC, Open A Arena, Doug Pritchett, 2DEEP Construction LLC, Brandon Dufurrena, Rieta Dufurrena, Ed Dufurrena, Scarlet & Black Cattle, LLC, Red Raider Cattle, LLC, Carraway Cattle LLC, Richard

**NOTICE OF APPEARANCE OF NATHANIEL PLEMONS
AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned appears as special counsel to Plaintiff Kent Ries, Chapter 7 Trustee, pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017, 9007 and 9010, and 11 U.S.C. §§ 342(a) and 1109(b), and requests that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, orders, disclosure statements and plans of reorganization, or other documents filed or entered in this case be transmitted to:

Nathaniel Plemons
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PLEASE TAKE FURTHER NOTICE that demand is also made that the undersigned be added to the Notice List for notice of all contested matters, adversary proceedings, and other proceedings in connection with this bankruptcy case and any jointly administered cases.

PLEASE TAKE FURTHER NOTICE that neither this Request for Notice nor any subsequent appearances, pleadings, claims, proofs of claim, documents, suits, motions nor any other writings or conduct, shall constitute a waiver of:

- a. The right to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Court Judge;
- b. The right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private right, or in any case, controversy or

Carraway, Robert Carraway, Gene Brookshire Family LP, Joel Brookshire, Carla Brookshire, Philip Rapp, Rapp Ranch, Big Seven Capital Partners, Bryan Blackman, Bravo Golf Aviation LLC, Dennis Buss, Edwin Buss, Bettye Butler, Billy Butler, Caleb Little, Dannie Winfrey, Diamond B Productions LLC, Eric Dejarnatt, Edwin Stewart, Ernest Gard, Gale Force Quarter Horses, Garwood Cattle Company, J&S Investments, Jim Rininger, Jimmy Greer, Peggy Greer, Joe Burnett, Dustin Johnson, Keith Harris Farms, Map Enterprises, Michael Cooper, Patrick Baker, Ralph Reisz, Veronica Reisz, Robert Stewart, Roger Welch, Rose Valley Ranch, Sawmill Creek LLC, Scott Stewart, Scott Livestock, Stanley Keith Myers, Tommy Manion Ranch, Inc., Brent Burnett, Codie Perry, Mykel Tidwell, Rick Rodgers, Stanley Ayers, Thorlakson Diamond T Feeders, Wiley Roby Russell Jr., WJ Performance Horses, Heartland Coop, Land O Lakes Ag Service, Reinert Hay Co., Vet Industries Feed & Supply, White Energy, Crystal McClain, Chelsea McClain, Piper McClain, and Kristain McClain.

proceeding related hereto, notwithstanding the designation *vel non* of such matters as “core proceedings” pursuant to 28 U.S.C. § 157(b)(2)(H), and whether or not such jury trial right is pursuant to statute or the United States Constitution;

c. The right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

d. All other rights, claims, actions, defenses, setoffs, recoupments or other matters to which this party is rightly entitled under any agreements or at law or in equity or under the United States Constitution.

All of the above rights are expressly reserved and preserved without exception and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these matters.

Respectfully submitted,

/s/ Nathaniel Plemons

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SPECIAL COUNSEL TO THE TRUSTEE

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing instrument was served upon the counsel and parties of record, electronically through the Bankruptcy Court’s Electronic Case Filing System on those parties that have consented to such service on March 5, 2025.

/s/ Nathaniel Plemons

Nathaniel Plemons